



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 2, 2018

VIA ECF

The Honorable Denise L. Cote
United States District Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1610
New York, New York 10007

Re: *United States v. Mahmoud Thiam*, 17 Cr. 47 (DLC)

Dear Judge Cote:

The Government writes to respectfully request, with the consent of counsel for claimant Sociedade Saboeira de NaCala (the "Claimant") in this forfeiture matter, that the Court grant an additional extension, until June 6, 2018, for the parties to either reach a resolution of the petition or file with the Court a joint proposed discovery and briefing schedule on the Petition.

As set forth in the Government's prior correspondence, the parties have engaged in discussions about a possible resolution of the Petition. Those discussions – which include Claimant providing additional information to the Government in support of the Petition so that the Government can better assess its merits – are continuing but are not yet complete. The Government therefore respectfully requests, with the consent of counsel for the Claimant, an additional extension, until June 6, 2018 to either reach a resolution of the petition or file with the Court a joint proposed discovery and briefing schedule on the Petition.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

by: _____/s/_____
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(212) 637-2599

cc: Aaron Goldsmith, Esq. (via ECF)